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10 *Counterclaimant, Third-Party Plaintiff*
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11 *Indian Harbor Insurance Company*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 MARIA GARNICA, an individual,

15 Plaintiff,

16 v.

17 INDIAN HARBOR INSURANCE COMPANY;
18 DOES I - V, and ROE CORPORATIONS I - V,
inclusive,

19 Defendants.
20

21 INDIAN HARBOR INSURANCE COMPANY,

22 Counterclaimant,

23 v.

24 MARIA GARNICA,

25 Counterdefendant.
26

CASE NO.: 2:21-cv-00560-JCM-VCF

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND OPPOSITION
AND REPLY FILING DEADLINES
AS IT RELATES TO LOUI DEEDS'S
MOTION TO COMPEL [ECF NO. 94]**

(FIRST REQUEST)

1 INDIAN HARBOR INSURANCE COMPANY,

2 Third-Party Plaintiff,

3 v.

4 LOUI DEEDS, an individual, NELLY IRAN, an
5 individual, BLUE SHIELD OF CALIFORNIA, a
California corporation,

6 Third Party Defendants.

7 LOUI DEEDS, an Individual,

8 Third-Party Defendant's Counterclaim,

9 v.

10 INDIAN HARBOR INSURANCE COMPANY;
11 DOES I-V, and ROE CORPORATIONS I-V,
inclusive

12 Counterdefendants.

13
14 COMES NOW, defendant, counterclaimant, third-party plaintiff, and counterdefendant
15 INDIAN HARBOR INSURANCE COMPANY (“Indian Harbor”), by and through its counsel of
record, Yvonne M. Schulte and Dylan Todd of Clyde & Co US LLP, and third-party defendant and
third-party counterclaimant LOUI DEEDS (“Deeds”), by and through her counsel of record,
Leonard H. Stone and Kurt D. Anderson of the law firm of Shook & Stone, Chtd., and hereby
submit this Stipulation and [Proposed] Order to Extend Opposition and Reply Filing Deadlines as
it Relates to Deeds’s Motion to Compel [ECF No. 94] (the “Motion to Compel”). Pursuant to Local
Rule IA 6-1(c), the parties state as follows: (1) the current deadline for Indian Harbor to file its
opposition in response to the Motion to Compel is July 14, 2023; (2) the current deadline for Deeds
to file her reply in support of the Motion to Compel is July 21, 2023; and (3) no hearing date has
been set with respect to the Motion to Compel. This is the parties’ first request to extend the
briefing deadlines as it relates to the Motion to Compel.

16 The parties seek to extend the briefing deadlines by seven (7) days such that the new
17 deadlines would be as follows: (1) the deadline for Indian Harbor to file its opposition in response

1 to the Motion to Compel would be July 21, 2023; and (2) the deadline for Deeds to file her reply in
2 support of the Motion to Compel would be July 28, 2023.

3 The parties request that the following factors be considered by the Court in establishing
4 good cause for the extension of the briefing deadlines:

- 5 1. The Motion to Compel was filed on June 30, 2023 [ECF No. 94].
- 6 2. On the date that the Motion to Compel was filed, Indian Harbor's counsel was
7 already out of the country with limited internet and email access.
- 8 3. Indian Harbor's counsel did not return from being out of the country until July 11,
9 2023.

10 4. Upon return, Indian Harbor's counsel has worked diligently and expeditiously to
11 prepare and file Indian Harbor's Opposition to the Motion to Compel. However, counsel for Indian
12 Harbor recently discovered that Indian Harbor's client representative and contact handling this
13 matter is on vacation with limited internet and email access and will not return until next week.

14 5. On July 12, 2023, counsel for Indian Harbor spoke with counsel for Deeds over the
15 phone and explained the scheduling/travel issues.

16 6. Given the complications present in adhering to the filing deadline for Indian
17 Harbor's Opposition to the Motion to Compel, Deeds's counsel was agreeable to a mutual extension
18 of seven (7) days regarding the parties' respective filing deadlines.

19 7. No hearing date has been set by the Court for the Motion to Compel and this is the
20 parties' first request for a stipulated extension of the briefing schedule for the Motion to Compel.

21 8. Accordingly, the parties seek to move the filing deadlines relative to Deeds's Motion
22 to Compel as follows:

- 23 a. The deadline for Indian Harbor to file its Opposition in response to Deeds's
24 Motion to Compel would be moved from July 14, 2023 to July 21, 2023; and
- 25 b. The deadline for Deeds to file her Reply in support of the Motion to Compel
26 would be moved from July 21, 2023 to July 28, 2023.

1 9. No further deadlines set by the Court would be affected by the granting of this
2 stipulated extension.

3 **IT IS SO STIPULATED AND AGREED:**

4 Dated: July 12, 2023

5 SHOOK & STONE, CHTD

6 CLYDE & CO US LLP

7 /s/ Kurt D. Anderson

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20 Third-Party Plaintiff Counterdefendant
21 Indian Harbor Insurance Company*

22 **ORDER**



22

UNITED STATES MAGISTRATE JUDGE

23 DATED: 7-13-2023